

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC,

Plaintiff,

v.

ISLAND PROJECT AND OPERATING SERVICES,
LLC; VITOL US HOLDING II CO.; VITOL VIRGIN
ISLANDS CORP.; ANDREW CANNING; and OPTIS
EUROPE, LTD.,

Defendants.

CIVIL NO. 1:21-CV-00312

**VITOL DEFENDANTS' SUPPLEMENTAL RULE 26(a)(1)
INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, Defendant Vitol Virgin Islands Corp. and Vitol U.S. Holding II Co. (collectively, the “Vitol Defendants”) submit these Initial Disclosures based on information reasonably and currently available to the Vitol Defendants. The Vitol Defendants reserve their right to supplement or amend these disclosures based on subsequent developments, including information obtained during discovery.

I. Individuals Likely to Have Discoverable Information

Name and Address	Subject Matter
Adrian Melendez c/o Lee Rohn Law Office of Lee Rohn 1101 King Street Christiansted, St. Croix U.S. Virgin Islands 00820 lee@rohnlaw.com 340-778-8855	Mr. Melendez is likely to have information concerning the contract(s) executed between Petro and IPOS; Petro’s work; internal and external guidelines used by Petro; safety issues; welding certificates and other documentation provided by Petro; and Petro’s claims of discrimination, defamation, and lost profits and/or lost business opportunities in this case.

EXHIBIT

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<p>Chad Persaud</p> <p>c/o Lee Rohn Law Office of Lee Rohn 1101 King Street Christiansted, St. Croix U.S. Virgin Islands 00820 lee@rohnlaw.com 340-778-8855</p>	<p>Mr. Persaud is likely to have information concerning the contract(s) executed between Petro and IPOS; Petro's work; internal and external guidelines used by Petro; safety issues; welding certificates and other documentation provided by Petro; and Petro's claims of discrimination, defamation, and lost profits and/or lost business opportunities in this case.</p>
<p>Elias Rivera</p> <p>c/o Lee Rohn Law Office of Lee Rohn 1101 King Street Christiansted, St. Croix U.S. Virgin Islands 00820 lee@rohnlaw.com 340-778-8855</p>	<p>Mr. Rivera is likely to have information concerning the contract(s) executed between Petro and IPOS; Petro's work; internal and external guidelines used by Petro; safety issues; welding certificates and other documentation provided by Petro; and Petro's claims of discrimination, defamation, and lost profits and/or lost business opportunities in this case.</p>
<p>Frank Kirsch</p> <p>c/o Lee Rohn Law Office of Lee Rohn 1101 King Street Christiansted, St. Croix U.S. Virgin Islands 00820 lee@rohnlaw.com 340-778-8855</p>	<p>Mr. Kirsch is likely to have information concerning the contract(s) executed between Petro and IPOS; Petro's work; internal and external guidelines used by Petro; safety issues; welding certificates and other documentation provided by Petro; and Petro's claims of discrimination, defamation, and lost profits and/or lost business opportunities in this case.</p>
<p>Guillermo Castro</p> <p>2956 Verdino Cir Corona, CA 92883 951-382-8883</p>	<p>Mr. Castro is likely to have information concerning the quality of Petro's welding work and concerning the veracity of the paperwork, including but not limited to welding certifications, that Petro submitted.</p>
<p>Andrew Canning</p> <p>c/o Andrew Simpson Andrew C. Simpson, P.C. 2191 Church Street, Suite 5 Christiansted, St. Croix, VI 00820 asimpson@coralbrief.com 340-719-3900</p>	<p>Mr. Canning is likely to have information concerning Petro's work; welding certificates and other documentation provided by Petro; the contractual relationships between the parties; Petro's claims of discrimination, defamation, and other allegedly unlawful conduct; and related matters.</p>
<p>OPTIS Europe Ltd.</p> <p>c/o Andrew Simpson Andrew C. Simpson, P.C. 2191 Church Street, Suite 5</p>	<p>OPTIS Euorpe Ltd. is likely to have information concerning Mr. Canning's work.</p>

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David Smith c/o Simone R. D. Francis Ogletree Deakins 1336 Beltjen Road, Suite 201 St. Thomas, VI 00802 simone.francis@ogletreedeakins.com 340-714-1235	Mr. Smith is likely to have information concerning the contractual relationships between the parties; Petro's work; welding certificates and other documentation provided by Petro; and related matters.
Merlin Figueira c/o Simone R. D. Francis Ogletree Deakins 1336 Beltjen Road, Suite 201 St. Thomas, VI 00802 simone.francis@ogletreedeakins.com 340-714-1235	Mr. Figueira is likely to have information concerning the contractual relationships between the parties; Petro's work; welding certificates and other documentation provided by Petro; and related matters.
Charlotte Horowitz c/o Alex Kaplan Susman Godfrey 1000 Louisiana St., Suite 5100 Houston, TX 77002 akaplan@susmangodfrey.com (713) 651-9366	Ms. Horowitz is likely to have information concerning the contractual relationships between the parties; the construction projects and physical assets at issue; the work of IPOS and OPTIS; Petro's work; and related matters.
Tim Kologinczak c/o Alex Kaplan Susman Godfrey 1000 Louisiana St., Suite 5100 Houston, TX 77002 akaplan@susmangodfrey.com (713) 651-9366	Mr. Kologinczak is likely to have information concerning the contractual relationships between the parties; the construction projects and physical assets at issue; the work of IPOS and OPTIS; Petro's work; and related matters.
Sebastian Moretti c/o Alex Kaplan Susman Godfrey 1000 Louisiana St., Suite 5100 Houston, TX 77002 akaplan@susmangodfrey.com (713) 651-9366	Mr. Moretti is likely to have information concerning the contractual relationships between the parties; the construction projects and physical assets at issue; the work of IPOS and OPTIS; Petro's work; and related matters.

<p>Acuren Inspection Services</p> <p>c/o Adam N. Marinelli 4608 Tutu Park Mall, Suite 202 St. Thomas, VI 00802 amarinelli@vilaw.com 800-218-7450</p>	<p>Acuren is likely to have information concerning the veracity of the paperwork, including but not limited to welding certifications, that Petro submitted in connection with its work for IPOS.</p>
<p>Matt Jensen</p> <p>c/o Adam N. Marinelli 4608 Tutu Park Mall, Suite 202 St. Thomas, VI 00802 amarinelli@vilaw.com 800-218-7450</p>	<p>Mr. Jensen is likely to have information concerning the veracity of the paperwork, including but not limited to welding certifications, that Petro submitted in connection with its work for IPOS.</p>
<p>Versa Integrity Group, Inc.</p> <p>c/o Adam N. Marinelli 4608 Tutu Park Mall, Suite 202 St. Thomas, VI 00802 amarinelli@vilaw.com 800-218-7450</p>	<p>Versa is likely to have information concerning the quality of Petro's welding work and information concerning tests it performed on Petro's work.</p>
<p>Johnas Semien</p> <p>c/o Adam N. Marinelli 4608 Tutu Park Mall, Suite 202 St. Thomas, VI 00802 amarinelli@vilaw.com 800-218-7450</p>	<p>Mr. Semien is likely to have information concerning the quality of Petro's welding work and information concerning tests it performed on Petro's work.</p>
<p>Traeger Brothers & Associates, Inc.</p> <p>12405 SW 130th St Miami, FL 33186 (305) 371-5551</p>	<p>Traeger Brothers is likely to have information concerning the quality of Petro's welding work, including the materials used by Petro.</p>
<p>Saintnals</p> <p>c/o Andrew Simpson Andrew C. Simpson, P.C. 2191 Church Street, Suite 5 Christiansted, St. Croix, VI 00820 asimpson@coralbrief.com 340-719-3900</p>	<p>Saintnals is likely to have information concerning damages and work conducted at the facilities after the termination of Petro's contract.</p>
<p>Oliver Garcia</p> <p>c/o Andrew Simpson Andrew C. Simpson, P.C.</p>	<p>Mr. Garcia is likely to have information concerning damages and work conducted at the facilities after the termination of Petro's contract.</p>

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Representatives of Petro Industrial Solutions, LLC c/o Lee Rohn Law Office of Lee Rohn 1101 King Street Christiansted, St. Croix U.S. Virgin Islands 00820 lee@rohnlaw.com 340-778-8855	Representatives of Petro are likely to have information concerning Petro's contract with IPOs; Petro's work; welding certificates and other documentation provided by Petro; and Petro's claims of discrimination, defamation, and lost profits and/or lost business opportunities in this case.

Additionally, the Vitol Defendants identify (1) all witnesses identified in the disclosures of other parties; (2) current and former officers, directors, or employees of Petro who have knowledge related to Petro's claims; (3) all necessary custodians of records; (4) all necessary foundation witnesses; and (5) other third parties whose identities are unknown at this time to the Vitol Defendants, including without limitation witnesses with knowledge regarding any lost contracts, business opportunities, or reputational injury that Petro may claim. The Vitol Defendants may also seek discovery from and rely on the testimony of any individual identified in any other party's Rule 26 disclosures.

II. Categories of Documents

The Vitol Defendants identify the following documents and reserve their right to supplement:

1. Facilities Services Agreement between Island Project and Operating Services LLC and Vitol Virgin Islands Corp. (which will be produced pursuant to a Stipulated Confidentiality Agreement and Protective Order);
2. Maintenance Contract between Petro Industrial Solutions, LLC and Island Project Operating Services LLC (which will be produced pursuant to a Stipulated Confidentiality Agreement and Protective Order);

3. Consulting Agreement between OPTIS Europe Ltd. and Vitol Virgin Islands Corp. (which will be produced pursuant to a Stipulated Confidentiality Agreement and Protective Order);
4. Communications between or among the Parties relating to Petro's work;
5. Petro's communications with, as well as documents from, Acuren, Versa, Traeger Brothers, and any other third party relating to Petro's work;
6. Pertinent welding requirements, procedures, practices, and standards of Petro;
7. Petro's certificates, licenses, and training logs for its welders, including but not limited to welding certificates that Petro provided for its work;
8. Petro's documents, if any, relating to its allegations of discrimination, defamation, and tortious interference;
9. Petro's documents, if any, relating to its allegations of lost profit, lost business opportunities, and alleged reputational injury as a result of the allegedly unlawful conduct at issue in the Complaint; and
10. Documents relied upon by expert witnesses of any party.

III. Computation of Damages

The Vitol Defendants deny that Petro is entitled to any damages or other relief. The Vitol Defendants will respond to Petro's damages claims at the appropriate time, after an adequate time for discovery regarding Petro's allegations, disclosure of Petro's damages evidence, and in accordance with the Court's fact and expert discovery schedule.

IV. Disclosure of Insurance Agreements

The Vitol Defendants are not aware of any relevant insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted,

Dated: June 23, 2023

s/ Carl A. Beckstedt III

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Attorneys for Vitol Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd of June, 2023, I sent by email the foregoing to the following:

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s/ Sarah Hannigan
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